UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

SALAH BAZZI, an individual Case No. 21-cv-10642

Plaintiff, Hon. Judge Robert H. Cleland

Mag. Judge Elizabeth A. Stafford

v.

WAYNE STATE UNIVERSITY, a public university; Doctor CHRISTOPHER STEFFES, MD, in his official capacity, and Doctor RICHARD BAKER, MD, in his official capacity as CHAIR OF THE PROMOTIONS COMMITTEE; jointly and severally,

Defendants.

STIPULATED PROTECTIVE ORDER

In accordance with the stipulation of the parties, IT IS ORDERED as follows:

- 1. Medical Records of Siham Ideis Shall be Considered Confidential and Shall not be Used for Purposes Outside of this Litigation except as may be agreed to by the parties in writing.
- 2. Within 90 days after final conclusion of all aspects of this litigation, including all appeals, protected documents and all copies of same (other than

exhibits of record) shall be returned to the party which produced such documents or destroyed by the receiving party.

- 3. The Court entering this Order shall maintain jurisdiction to decide disputes involving this Order.
- 4. Nothing in this Order shall be read to inhibit Plaintiff's ability to prosecute this action or Defendant's ability to defend itself and nothing in this Order requires either party to file Medical Records under seal.

<u>S/Robert H. Cleland</u> United States District Court Judge

Dated: April 19, 2022

I STIPULATE TO THE ENTRY OF THE ABOVE ORDER:

/s/William D. Savage (w/consent)

AYAD LAW, PLLC Nabih H. Ayad (P59518) William D. Savage (P82146) 645 Griswold St., Suite 2202 Detroit, MI 48226 313.986.4600/Fax: 313.983.4665

filing@ayadlawpllc.com Attorney for Plaintiff

13.963.4003

/s/Brett J. Miller

Brett J. Miller (P68612)
Blake C. Padget (P82978)
150 W. Jefferson Avenue, Suite 100
Detroit, MI 48226
313.225.5316
millerbr@butzel.com
padget@butzel.com

Attorney for Defendant